DOCUMENT RESUME

ED 155 920 FL 009 525

AUTHOR Chai, Nemia M.
TITLE English as a Foreign Legal Language (An Inquiry Into Philippine Multilingualism).
PUB DATE Apr 78
NOTE 22p.; Paper presented at the annual Southeastern Conference on Linguistics (Knoxville, Tennessee, April 7-8, 1978).

EDRS PRICE MF-$0.83 HC-$1.67 Plus Postage.
DESCRIPTORS *English (Second Language); Interviews; Language Planning; *Language Role; *Languages for Special Purposes; *Language Usage; Multilingualism; *Official Languages; Sociolinguistics; Wills; Written Language
IDENTIFIERS Aklan; *Law; *Philippines (Aklan)

ABSTRACT

This paper represents an initial attempt at assessing the role of English as a legal language in the Western Visayan province of Aklan in the Philippines. In particular, the study sought to determine the extent to which English is used as a legal language in Aklan as well as in what ways, and the extent to which the law itself may be considered an effective form of social control through the medium of English. Data were collected from a small body of legal documents and informal interviews with several practicing lawyers and judges. Informal interviews were also made with some national linguists concerned with language planning. The study indicates that English is the preferred medium of the law, and is used except in cases where a preference for Aklan is indicated, as in some wills. English is also seen as the medium that lends reality to the legacy of the Anglo-American legal system, and the use of English in legal situations is seen not as a matter of choice but of necessity. (Author/AM)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ENGLISH AS A FOREIGN LEGAL LANGUAGE

(AN INQUIRY INTO PHILIPPINE MULTILINGUALISM)

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

Nemia M. Chai

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC) AND USERS OF THE ERIC SYSTEM."

by

Nemia M. Chai
Division of Language-Humanities
Columbus College
Columbus, Georgia 31907

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

THIS DOCUMENT HAS BEEN REPRODUCED EXACTLY AS RECEIVED FROM THE PERSON OR ORGANIZATION ORIGINATING IT. POINTS OF VIEW OR OPINIONS STATED DO NOT NECESSARILY REPRESENT OFFICIAL NATIONAL INSTITUTE OF EDUCATION POSITION OR POLICY

ED155920

Purpose. This paper is an initial attempt to assess the role of English as a legal language in the Western Visayan province of Aklan, Republic of the Philippines. The questions we shall address are as follows:

1. To what extent, and in what ways, is English used as a legal language in Aklan?
2. In what ways may the law itself be considered an effective form of social control through the medium of English, a non-native language?

Data for this paper consist of (a) a small body of legal documents that were collected during this reporter's visit to Kalibo, the provincial capital, in August-September, 1977; and (b) informal interviews with several practicing lawyer-notaries public in Kalibo and two of the three judges in the Court of First Instance of Aklan.[1] Informal interviews were also made with some national linguists who are grappling with the present national enigma of multilingualism and language policy.[2]

General Introduction. Needless to say, our concern here deals with the status of English as a dominant foreign

FL009525
6-78-69

legal language within the domain of multilingualism and in the light of the emergence of new nations as sovereign states. The exigencies of the Third World and newly independent nations are many in both kind and degree. Analysts of international politics tell us that the emergence of these nations has largely been spurred by their claim to self-determination and national identity. Many of these countries, particularly those that were previously subjected to colonial domination, are more aggressive than ever in establishing their national identity once and for all, including their linguistic uniqueness.

Certainly for the Philippines, like other Third World nations, one of these exigencies concerns language, whether or not it surfaces in overt international stances. This problem may be viewed in two dimensions. On the one hand, the Philippine government sees it fit to articulate its vital national interests as well as its position on international issues, and in order to do so its government spokesmen are expected to demonstrate proficiency and competence in an international language. In this case it happens to be English; however, English has never attained the status of a native language for the populace although it is the most widely used official language throughout the country. Spanish, the official language during the nearly 400-year Spanish rule, has become marginally used although its loans remain abundant.

On the other hand, the Philippines is also in dire need of a common, native, national language in order to buttress its claim to national unity. Two major obstacles have continued

to work against achieving this goal, however: one is the topography of the land being an archipelago with some 7,000 islands, approximately 3,000 of which are inhabited; the other is the bewildering diversity of some 100 indigenous linguistic entities among the 32,000,000 population. As it stands now, Section 3 of Article XV "General Provisions" of the 1973 Constitution provides, among others, that:

> (2) The National Assembly shall take steps towards the development and formal adoption of a common national language to be known as Pilipino.
>
> (3) Until otherwise provided by law, English and Filipino shall be the official languages. /italics mine/3

The great dilemma lies in whatever reality 'Filipino' has yet to signify: whether it be the language developed from the regional Tagalog-based dialect recently dubbed 'Pilipino,' which non-Tagalog supporters vehemently oppose, or a truly synthetic amalgam of Philippine languages which the Constitution has in a way only created by fiat.[4] When one is aware that Pilipino has the support of the Institute of National Language, the right arm of the Department of Education and Culture on language policy, and national scholars with considerable influence on the matter of national language planning, it becomes easy enough to project that 'Pilipino' and 'Filipino' will turn out simply to be different terms without a distinction. As Professor Leopoldo Y. Yabes of the University of the Philippines puts it, "since they /the Tagalog proponents, or Tagalistas/ have rebaptized Tagalog into 'Pilipino,' it should not be too difficult for them to rebaptize 'Pilipino' into 'Filipino.' It

would still be the same dog, but with a different collar now."[5]

Meanwhile, as Filipino has yet to exist, the Secretary of the Department of Education and Culture, issued Department Order No. 25, s. 1974, on June 19, 1974, mandating that Pilipino be used as the medium of instruction in Social Studies/Social Science, Word Education, Character Education, Health Education, and Physical Education; and English be used in Mathematics and Science, Music and Art. These provisions apply beginning in Grade I, with the auxiliary use of local vernaculars. An impressive amount of studies has been and are being conducted on this national question, but covering any more here would take us far afield from our present topic.

Extent and Ways of Use of English as a Legal Language. Paucity of legal documents drawn in the native Aklan dialect seems to indicate that it is not quite the norm to use the vernacular for such purposes. English is commonly preferred except under specific conditions.

A total of 23 legal documents was collected for this inquiry; below these are grouped according to type of document and language in which they are drawn:

A.	Deed of absolute sale (8)	English
	registered land[6] (3)	
	unregistered land[7] (2)	
	motor cycle[8] (2)	
	automobile[9] (1)	
B.	Special power of attorney[10] (4)	English
C.	Deed of chattel mortgage[11] (2)	English

D.	Last will and testament[12]	(2)	Aklan
E.	Articles of incorporation of Aklan Sportman's Enterprises, Inc. 13	(1)	English
F.	Deed of assignment of lease rights 14	(1)	English
G.	Contract of lease of fishpond 15	(1)	English
H.	Affidavit[16]	(1)	English
I.	Deed of quitclaim[17]	(1)	English
J.	Credit of agreement[18]	(1)	English
K.	1973 Constitution [19]	(1)	English

Although these documents are scant for quantitative justification, they serve to confirm oral interviews with several practicing lawyer-notaries public in Kalibo concerning the prevalent preference of English to either Aklan or Pilipino or Spanish in legal usage. It is not customary practice for legal practitioners in Kalibo to execute their documents in any language other than English, unless expressly requested to do otherwise.

In the case of the two specimens of last will and testament, the only documents in our data rendered in Aklan, the testator in one and the testatrix in the other had requested the use of the native vernacular presumably because both, lacking proficiency in English, wanted to ascertain that they understood the terms of those documents. It is worth noting, however, that in these two documents the attestation clause signed by witnesses and the lawyer-notary public's acknowledgment appear in English.

Another instance in which the Aklan dialect has been put to challenge is the translation from the original English text of the 1973 Constitution of the Philippines done by Roman I. de la Cruz, a journalist in Kalibo. Like the two wills, this translation was requested by an interested party, Ponciano B. Pineda, Director of the Institute of National Language.[20] It is also interesting that dela Cruz's cover letter which accompanied the translation is written in English.

In order to specify any extent of the use of English in relation to Aklan and Spanish, let us look at the two sets of texts: Text Set A, consisting of the original in Aklan of one of the two wills and an approximate translation of it into English; and Text Set B, consisting of the original in English of a portion of the 1973 Constitution and its strict translation into Aklan. Lexical items indicated in single underlining are identified as English; those in double underlining are identified as Spanish; those in broken line between double underlining (=--=) are identified as either English or Spanish; and those in single underlining and broken line (_--_) are italicized in the original text.

Text Set A (original in Aklan translated into English)

LAST WILL AND TESTAMENT OF _____

SA TANAN NGA MAKASAYUD:

Ako, _____, sangcad sa gu-eang, asawa ni _____, ag naga poyo sa Barrio Tinigao-Manabayan, Banwa it Kalibo, Provincia is Aklan, Filipinas, nga makaron una sa mayad nga cahimtangan sa eawas, matinlo, mahayag, ag sa dugalingon nga pa-inoino, ag owa guina pa-agui sa pakusog, pa-eag, limbong, inganyo, ag ano paman nga maeain nga pahito, akon guina panagubilin ag guina patunayan rayang akong testamento nga akon guina pabuhat sa hambae nga inakeanon, akong dugalingon ag guin matahar nga hambae, ag ako naga pahamtang kong mga masunod:

I. Akon guin bilin ag guina pa-athag nga rong solo ag unico nga heredero kong tanan nakong pagkabutang, eogta ag personal nga pagkabutang mga pautang nga prenda kakon, ag tanan nga cuarta nga deposito ko maski sa ano man nga bangko, imaw rong akon nga gumancong si _____, sangkad sa gueang, owat asawa, ag naga poyo sa 106 Milton Street, San Francisco, California.

II. Akon man guina bilin nga rong akong nasambit nga heredero _____ paga himu-on nga ejecutor nga owat fianza.

SA PAGKA MATU-OD KONG TANAN NGA GUINA ASOY, akon guina firmahan rayang testamento ko fecha 17 it Julio, 1976, sa Banwa it Kalibo, Provincia it Aklan, Filipinas.

_____
Testator

LAST WILL AND TESTAMENT OF _____

KNOW ALL MEN BY THESE PRESENTS:

I, _____, of legal age, married to _____, and residing in Barrio Tinigao-Manabayan, Town of Kalibo, Province of Aklan, Philippines, presently sound in body, in clear control of my own mental faculties, and without intimidation of force, threat, deception, persuasion, or any other inappropriate manner, do hereby declare in this testament, rendered authentic in Aklan, my own native tongue, the following:

I. That I will all my property, real and personal, that has been mortgaged to me, and all my money deposited in whatever bank, to my sole and unique heir, my nephew, _____, of legal age, single, and residing at 106 Milton Street, San Francisco, California.

II. That I also declare that my above-named heir, _____, be made the executor without bond.

IN WITNESS WHEREOF, I hereunto affix my signature on this testament on this 17th day of July, 1976, Town of Kalibo, Province of Aklan, Philippines.

_____
Testator

Text Set B (original in English translated into Aklan: Section 2 under D. "The Commission on Audit," of Article XII "The Constitutional Commissions," 1973 Constitution)

Sec. 2. The Commission on Audit shall have the following powers and functions:

(1) Examine, audit, and settle, in accordance with law and regulations, all accounts pertaining to the revenues and receipts of, and expenditures or uses of funds and property, owned or held in trust by, or pertaining to, the Government, or any of its subdivisions, agencies, or instrumentalities, including government-owned or controlled corporations; keep the general accounts of the Government and, for such period as may be provided by law, preserve the vouchers pertaining thereto; and promulgate accounting and audition rules and regulations including those for the prevention of irregular, unnecessary, excessive, or extravagant expenditures or uses of funds and property.

(2) Decide any case brought before it within sixty days from the date of its submission for resolution. Unless otherwise provided by law, any decision, order, or ruling of the Commission may be brought to the Supreme Court on certiorari by the aggrieved party within thirty days from his receipt of a copy thereof.

(3) Submit to the President, the Prime Minister, and the National Assembly, within the time fixed by law, an annual financial report of the Government, its subdivisions, agencies, and instrumentalities, including government-owned or controlled

corporations, and recommend measures necessary to improve their efficiency and effectiveness. It shall submit such other reports as may be required by law.

(4) Perform such other duties and functions as may be prescribed by law.

Sek. 2. Ro Komisyoner sa Udit hay may masunod nga mga gahum ag hilimuon:

(1) Maga egsamen, maga udit, ag maga husay, sandig sa ley ag mga sueondanan, tanan nga mga kwenta nahanungod sa kinita ag nabaton, ag mga gaeastohan o ginadapatan it mga fundo ag igdaeapat, ginapanag-iyahan o ginadapatan sa komfiyansa, o nahanungod sa Gobyerno, o sa ano man nga mga subdivisyon, ahensya, o kagamitan, pati ro mga korporasyon nga gina panag-iyahan o kontrolado it Gobyerno; tatapon to tanan nga mga kwenta it Gobyerno ag, para sa kaeawig it tyempo nga nga sugo it ley, ipreserbar ro mga voucher nahanungod kara; ag maga-publikar it mga kasuguan ag mga sueondanan pati ratong para sa paglikaw ku owa nagakabagay, owa it kinahangean, naga paea-nubra, o nagapaeangeapaw nga mga kagastohan o mga kadapatunan it fundo ag propredad.

(2) Magadisidir sa ano man nga kaso nga ginadaea sa anang atubangan sa sakop it an-um nga pueong adlaw maghalin sa adlaw it pagtunghoe para mahusayan. Euwas kon eain to kagustohan it ley, ano man nga disisyon, sugo, o sueondanan ku Komisyon hay madaea sa Korte Suprema sa certiorari ku agrabyado nga partido sa sueod it tatlong pueong adlaw maghalin ku anang pagkabaton it kopya kara.

(3) Maga tao sa Presidente, sa Primer Ministro, ag sa Asembliya Nasyonal, sa sueod it tyempo nga ginapat-in it ley, sangka dinag-on nga report ku kwarta it Gobyerno, anang mga subdivisyon, mga ahensya, ag mga kagamitan, pati ro mga korporasyon nga gina panag-iyahan o kontrolado it Gobyerno,

ag maga hueong it mga sueondanan nga kinahangean sa pag pataas ku andang kapuslanan ag kadapatonan. Magatao man ra it iba nga mga report nga pagakinahangeanon it ley.

(4) Magahimo it iba pa nga mga katungdanan ag bueohaton nga pagakinahangeanon it ley.

Hymes' concept of repertoire, which consists of "ways of speaking," is an appropriate framework to help explain the phenomenon of multilingualism here. When repertoire is understood to figure in a multilingual setting, linguistic diversity refers specifically to "means of speech, and their meanings to those who use them."[22] Accordingly, in the Aklan original in Text Set A the language uses hardly any English lexicon, and the occurrence of Spanish loans seems wholly appropriate as though they were native Aklan. In other words, these Spanish loans are acceptable to the testator for the purposes of the will.

Likewise, in the Aklan translation in Text Set B code-switching involves multilingual loans of terminologies from English but more abundantly from Spanish. A candid explanation should point out the fact that no native Aklan terms are presently available into which these sorts of foreign lexicon may be translated. This experience of inadequacy recalls for us a similar experience among the users of English in the Middle English period when "it was estimated that more than 10,000 French words became English, . . . and that about 7,500 of these are in use today."[23]

It seems apparent that English loans are relatively fewer than Spanish loans in documents that are deliberately rendered in Aklan. Such an observation should not overshadow the fact that in otherwise ordinary, casual conversations the educated speakers seem more free in using English loans. Thus it is not only "culturally appropriate to use one language in one

situation and another in some other situation," as Pascasio[24] claims, but it must also be appropriate to use a sort of Sprachmischung, an amalgam of whatever linguistic resources that are available.

Ways in Which the Law Itself May Be Effective through the Medium of English. While one could claim that a common Philippine national language would serve "as a unifying force and a medium to express the Filipinos' national heritage, sentiments, and culture,"[25] one could also conjecture with some certainty that English is likely to remain for quite some time as the language of the law in Aklan as in the rest of the Philippines.

For one reason, the English language is the appropriate medium that lends reality to the legacy of Anglo-American legal system in the Philippines as a result of the transfer of sovereignty over the country from Spain to the United States, as officialized with the ratification of the Treaty of Paris on December 10, 1898. To be sure, the English language alone could not have sufficed in the Americanization of the country with its diverse groups of people, each with a native vernacular. Nevertheless, it has functioned as the main mechanism by which were made possible real changes in the country--in communicating the concepts of democracy, in establishing a balanced rather than an extractive system of commerce and industry, in promoting pacification, and even in the U.S. realization of the potential market of the new colony's natural wealth for imports

back to America.[26]

For a second reason, in the eight decades during which the Filipinos were exposed to English court records have progressively been rendered in English as a matter of practical convenience: court stenographers have trained to take notes of court proceedings exclusively in English. This period came after the years between 1906 and 1930 when Spanish was gradually phased out as the court language and English became its replacement, although in 1930 "both English and Spanish should be the official languages of all courts, but leaving it to their discretion to make records in either language as might be deemed best for the public convenience and the interested parties."[27] World War II turned out to be one main factor that contributed to the rapid demise of Spanish as the court language. Today no judge or practicing lawyer in Aklan is competent to preside or argue a case in court in the Spanish language.

For a third reason, the dominance of English in legal use does not yet appear to be a matter of choice but rather of necessity. That English is the preferred official language of the law is a matter of constitutional record. Provision (1) of Section 3 under Article XV "General Provisions" of the 1973 Constitution clearly stipulates:

> This Constitution shall be officially promulgated in Englsh and in Pilipino, and translated into each dialect spoken by over fifty thousand people, and into Spanish and Arabic. In case of conflict, the English text shall prevail.

In the 1960's the literacy rate in the Philippines

among people 10 years and over was put at approximately 72 %,[28] the highest in Southeast Asia. The fact that education is highly regarded as an indispensable passport to individual advancement and national progress certainly points to the far-reaching significance of the written word of the law.[29] When English serves as the constitutionally preferred official language while the native vernaculars play the role of auxiliary media (since one of these vernaculars are not written and those that are written do not still have their standardized orthography), it becomes entirely logical that legal documents are drawn in English.

Summary. Our focus here on the role of English as a foreign legal language in Aklan has shown that English is the customarily used medium in legal documents of the types examined, except when the use of Aklan is specifically requested. We have further exemplified that such instances as those in which Aklan is preferred code-switching involves the use of loans, and that majority of these loans are Spanish rather than English; this seems to indicate the long-established assimilation of Spanish into Aklan that has endured.

As to how effective the Anglo-American-derived legal system of the Philippines, we did not examine the law itself, the la langue in linguistic parlance,[30] and are therefore unable to offer any definitive statement. We have, however, attempted to show that English seems to be working medium of the law. And whatever modifications English may undergo in this function

depends on how the Aklan speech-community, as well as similar other speech-communities throughout the Philippines and those of the Third World, will use their resources.

FOOTNOTES

1 Cf. pp. 4-5 and fns. 6-19 below for the list and details of legal documents here; among the lawyer-notaries public interviewed were Attys. Manuel A. dela Cruz, Pedro Icamina, Diego Luces, Victorio R. Mabasa, and Remedios T. Mapiso (Clerk of Court); Hon. Gerardo M.S. Pepito, Executive Judge and Presiding Judge, Branch III, Court of First Instance of Aklan (Judge Pepito, a native speaker of Cebuano, a Visayan dialect, served as Chairman of the Committee on National Language during the national Constitutional Convention in 1971-72), and Hon. Amelia K. del Rosario, Executive Judge and Presiding Judge, Branch II, Court of First Instance of Aklan. I am grateful for the information shared by these resource individuals.

2 Prof. Ernesto Constantino, University of the Philippines; Bro. Andrew Gonzales, F.S.C., De La Salle University; Prof. Emy M. Pascasio, Ateneo de Manila University; and Mrs. Cecilia C. Pastrana, University of the Philippines. I acknowledge with deep appreciation the valuable help extended by these scholars.

3 The distinction between 'Pilipino' and 'Filipino' is that Tagalog-based orthography does not contain the letter 'p,' whereas the proposed 'Filipino,' an amalgam of Philippine dialects, is intended to reflect loans and therefore the inclusion of 'f' in its orthography.

4 One of the most articulate supporters of the development of Filipino based on Pilipino is Bro. Andrew Gonzales, who argues that simply mandating the creation of a national language, as by a constitional order, does not bring about the existence of a real language. Cf. especially Andrew Gonzales, "The 1973 Constitution and the Bilingual Education Policy of the Department of Education and Culture," Philippine Studies, Vol 22 (1974).

5 Leopoldo Y. Yabes, "History of Filipino as the Common National Language," Language Planning and the Building of a National Language, ed. by Bonifacio P. Sibayan and Andrew B. Gonzales (Philippine Normal College: Linguistic Society of the Philippines and Language Study Center, 1977), p. 342.

6 Aniano G. Zarate, Doc. 146, Page 64, Book VII, Series 1972; Doc. 147, Page 65, Book VII, Series 1972; Victorio R. Mabasa, Doc. 702, Page 98, Book XXIV, Series 1976.

7 Victorio R. Mabasa, Doc. 840, Page 25, Book XXV, Series 1976; Doc. 10, Page 59, Book XXIII, Series 1976.

8 _____, Doc. 704, Page 98, Book XXIV, Series 1976; Doc. 892, Page 36, Book XXV, Series 1976.

9 _____, Doc. 11, Page 60, Book XVIII, Series 1976.

10 _____, Doc. 708, Page 99, Book XXIV, Series 1976; Doc. 835, Page 24, Book XXV, Series 1976; Doc. 861, Page 30, Book XXV, Series 1976; Doc. 871, Page 32, Book XXV, Series 1976.

11 _____, Doc. 136, Page 85, Book XXIII, Series 1976; Doc. 884, Page 34, Book XXV, Series 1976.

12 _____, Doc. 712, Page 100, Book XXIV, Series 1976; Doc. 713, Page 100, Book XXIV, Series 1976.

13 _____, Doc. 768, Page 11, Book XXV, Series 1976.

14 _____, Doc. 873, Page 32, Book XXV, Series 1976.

15 _____, Doc. 153, Page 88, Book XXIII, Series 1976.

16 _____, Doc. 703, Page 98, Book XXIV, Series 1976.

17 _____, Doc. 891, Page 36, Book XXV, Series 1976.

18 _____, Doc. 135, Page 84, Book XXIII, Series 1976.

19 Constitution of the Republic of the Philippines (1973).

20 Translation of the 1973 Constitution into the native dialects is ordered in the same document; see p. 15 below for a statement of this provision.

21 The title of this particular Aklan document, as well as the other will, appears in English.

22 Dell Hymes, "Speech and Language: On the Origins and Foundations of Inequality Among Speakers," Language as a Human Problem, ed. by Morton Bloomfield and Einar Haugen (New York: W.W. Norton & Company, 1974), p. 53.

23 Herbert Mitgang, "It's Legal--But Is It English?," New York Times Sunday Magazine (November 13, 1960),p. 73.

24 Emy M. Pascasio, "Communication in Its Socio-Cultural Context" (a mimeograph manuscript), presented at Bi-National Conference on Intercultural Communication (Philippines-United States)(Manila and Quezon City, July 29-August 2, 1976), p. 10.

25 Pascasio, "Notes and Comments," Philippine Studies, Vol. 23 (1975), p. 371.

26 These nonlinguistic aspects are discussed within the broad scope of education in the chapter entitled "Nation Building" in Peter W. Stanley, A Nation in the Making (The Philippines and the United States, 1899-1921)(Cambridge: Harvard University Press, 1974), pp. 81-113.

27 Ernest J. Frei, The Historical Development of the Philippine National Language (Manila: Bureau of Printing, 1959), pp. 27-38. For a discussion of change-over from Hispanic to Anglo-American legal system, see Chapter VIII, "The History of Philippine Law: After the Spanish Conquest," in Melquiades J. Gamboa, An Introduction to Philippine Law, 7th ed. (Quezon City: Central Lawbook Publishing Co., Inc., 1969), pp. 69-78.

28 Encyclopaedia Britannica, Vol. 17 (Chicago: Encyclopaedia Britannica, Inc. 1970), p. 854.

29 David Mellinkoff, The Language of the Law (Boston: Little, Brown and Company, 1963), p. 139.

30 Lawrence M. Friedman, "Legal Culture and Social Development" (manuscript provided as part of readings in Comparative Law: The Modernization of Law in China, taught by Professor Jerome A. Cohen, Director of East Asian Legal Studies, Harvard Law School (Fall, 1976), obtained through the courtesy of Professor Nam-Yearl Chai, visiting scholar at East Asian Legal Studies, 1976-77).